

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL JOSEPH MONROE,

Defendant.

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Case No. 4:20-CR-00487 MTS/NAB

**DEFENDANT’S MOTION FOR LEAVE TO FILE SECOND  
EMERGENCY MOTION TO RECONSIDER DETENTION ORDER  
AND RELEASE DEFENDANT ON BOND, OR IN THE ALTERNATIVE,  
MOTION TO SET BOND UNDER SEAL**

COMES NOW Defendant Michael Joseph Monroe, by and through his attorney, Luke A. Baumstark, and, for his Motion for Leave to File Second Emergency Motion to Reconsider Detention Order and Release Defendant on Bond, or in the Alternative, Motion to Set Bond Under Seal, states:

1. Counsel for Defendant files concurrently Defendant’s Second Emergency Motion to Reconsider Detention Order and Release Defendant on Bond, or in the Alternative, Motion to Set Bond (hereafter “Motion”).
2. Defendant’s Motion contains confidential and sensitive information, including medical information.
3. Defendant would be prejudiced were the confidential and sensitive information in his Motion was to be made public.

WHEREFORE, Defendant Monroe requests that the Court grant this Motion and allow him to file his Second Emergency Motion to Reconsider Detention Order and Release Defendant on Bond, or in the Alternative, Motion to Set Bond Under Seal, under seal.

Respectfully submitted,

/s/ Luke A. Baumstark

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*Attorney for Defendant*

*Michael Joseph Monroe*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 19<sup>th</sup> day of April, 2021, I filed the foregoing in the above mentioned action with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties of record.

/s/ Luke A. Baumstark